

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

2 charlesverhoeven@quinnemanuel.com

David A. Perlson (Bar No. 209502)

3 davidperlson@quinnemanuel.com

Melissa Baily (Bar No. 237649)

4 melissabaily@quinnemanuel.com

John Neukom (Bar No. 275887)

5 johnneukom@quinnemanuel.com

Jordan Jaffe (Bar No. 254886)

6 jordanjaffe@quinnemanuel.com

50 California Street, 22nd Floor

7 San Francisco, California 94111-4788

Telephone: (415) 875-6600

8 Facsimile: (415) 875-6700

9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER
IN SUPPORT OF PLAINTIFF WAYMO
LLC'S ADMINISTRATIVE MOTION TO
FILE UNDER SEAL ITS OPPOSITION
TO UBER'S MOTION TO COMPEL**

1 I, Lindsay Cooper, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under
7 Seal information in its July 28, 2017 Opposition to Uber’s Motion to Compel (the “Administrative
8 Motion”). The Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Portions of Waymo’s July 28, 2017 Opposition to Uber’s Motion to Compel	Portions highlighted in green	Waymo
Portions of Exhibit 2 to Waymo’s July 28, 2017 Opposition to Uber’s Motion to Compel	Portions highlighted in red	Waymo
Portions of Exhibit 3 to Waymo’s July 28, 2017 Opposition to Uber’s Motion to Compel	Portions highlighted in green	Waymo

16 3. Portions of Waymo’s Opposition (identified in the table above) contain, discuss, or
17 refer to Waymo’s confidential business information, including internal Waymo documents describing
18 its market analyses, plans, forecasts, and financial information. Specifically, portions of Waymo’s
19 Opposition describe documents that Waymo has produced in this litigation, designated as HIGHLY
20 CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the protective order, that refer to Waymo’s
21 highly confidential business strategy and thinking. Exhibits 2 and 3 are excerpts of depositions from
22 personnel in Waymo’s business and product development divisions discussing such sensitive
23 documents and strategy. Public disclosure of this information to Waymo’s competitors would harm
24 Waymo by giving its competitors access to Waymo’s highly confidential internal business thinking.
25 Waymo’s request to seal is narrowly tailored to only the confidential information.
26
27
28

1 I declare under penalty of perjury under the laws of the State of California that the foregoing is
2 true and correct, and that this declaration was executed in San Francisco, California, on July 28, 2017.

3 By /s/ Lindsay Cooper

4 Lindsay Cooper

5 Attorneys for WAYMO LLC

6 **SIGNATURE ATTESTATION**

7 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the
8 filing of this document has been obtained from Lindsay Cooper.
9

10 /s/ Charles K. Verhoeven

11 Charles K. Verhoeven